

EISENBERG & BAUM

May 22, 2014

VIA ECF

Honorable Vincent L. Briccetti
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: Wang v. IBM - Index No.: 11 Civ. 2992 (VB)

Dear Judge Briccetti:

As you are already aware, our firm represents the Plaintiff, James Wang in the above mentioned matter. We are in receipt of your order dated May 21, 2014 (DE #65). We understand that you have granted leave for Defendant to file a motion to enforce the settlement agreement. We write to inform the Court of relevant issues related to the order.

As it will become clearer to Your Honor in Plaintiffs Counsel's motion to withdraw to be filed tomorrow, there is an irreconcilable conflict between the Plaintiff and this firm. It is our understanding that Plaintiff James Wang will want to oppose this motion. Without revealing any confidential or privileged information in this letter, there is an inherent conflict in requiring our firm to put in opposition papers to the motion to enforce. We are therefore requesting that Your Honor decide on the motion to withdraw and stay the due date for opposition papers for the motion to enforce so that Plaintiff can be allowed time to find new counsel or continue pro se to address the motion, if necessary

Thank you for your consideration in this matter.

Respectfully submitted,

EISENBERG & BAUM, LLP

By: 
Andrew Rozynski, Esq.

cc: All Attorneys of Record (Via ECF)
James Wang (Via-E-mail)